

UNITED STATES DISTRICT COURT
for the
District of Massachusetts

JOSE MARIA DECASTRO, an individual) Case No. 1:22-cv-11421
Plaintiff,)
v.)
JOSHUA ABRAMS, an individual, et al.,)
Defendants.)

PLAINTIFF'S MOTION FOR LEAVE TO FILE REPLY AND UNDER SEAL; OR

ALTERNATIVELY TO STRIKE

Plaintiff Jose DeCastro ("Plaintiff" or "I"), hereby moves this Court to allow him to file a reply to Defendant Katherine Peter's ("Peter") Opposition (ECF No. 71) to my Motion for Contempt (ECF No. 61), and to file that reply under seal. Alternatively, to strike the portions of Peter's Opposition that were not restricted to rebutting my Motion for Contempt.

The parties have not yet agreed on a briefing schedule which would disallow a reply and Peter alleges new facts and introduces new arguments irrelevant to my motion. Her reply was meant to harass and delay this proceeding. I would like an opportunity to reply to the alleged new facts and argument on the record. I am asking to file under seal because publicly speaking of harassment from Defendant Peter's troll farm seems to excite the trolls to initiating more harassment, and this reply is not substantially necessary to the public's right of judicial records related to this proceeding.

DECLARATION

I declare under penalty of perjury, that the foregoing is true and correct.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

The court has waived this local rule for the remainder of this action.

Dated: December 9, 2022

Respectfully submitted,

/s/ Jose DeCastro
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Jose DeCastro